

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Oral Argument Requested

**NOTICE OF WHOLESALER DEFENDANTS' MOTION TO EXCLUDE
THE OPINIONS OF RENA CONTI, Ph.D.**

PLEASE TAKE NOTICE that on June 21, 2022, or as soon thereafter as counsel may be heard, the undersigned Defense Executive Committee counsel, on behalf of Wholesaler Defendants named below, shall move for an entry of Order excluding all opinions of Plaintiffs' expert, Reni Conti, Ph.D., as to Wholesaler Defendants, including but not limited to unjust enrichment and unjust enrichment damages opinions, pursuant to Federal Rules of Evidence 104, 702, and 703.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: May 3, 2022

Respectfully submitted:

/s/ Jeffrey D. Geoppinger
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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of May, 2022, I filed the foregoing
**NOTICE OF WHOLESALER DEFENDANTS' MOTION TO EXCLUDE
THE OPINIONS OF RENA CONTI, Ph.D.** electronically through the CM/ECF
system, which will send notice of filing to all CM/ECF participants.

s/ Jeffrey D. Geoppinger
Jeffrey D. Geoppinger